

1 THE HONORABLE BARBARA J. ROTHSTEIN  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 WILBERT NAPOLEON, individually and on  
behalf of all others similarly situated,

Case No.: 2:24-CV-00186-BJR

10 Plaintiff,

11 **STIPULATED MOTION TO EXTEND  
DEADLINES AND ORDER**

12 v.

13 AMAZON.COM, INC.,

14 Defendant.

15  
16 **STIPULATED MOTION**

17 Plaintiff Wilbert Napoleon and Defendant Amazon.com, Inc. hereby stipulate to extend the  
18 deadlines to respond to the Complaint and initial discovery deadlines.

19 On February 9, 2024, Plaintiff filed his putative Class Action Complaint. Dkt. No. 1. On  
20 February 15, 2024, Plaintiff served Defendant with the Complaint. Dkt. No. 16. On February 28,  
21 2024, pursuant to the parties' stipulated motion to extend deadlines to amend and respond to  
22 Complaint, the Court extended the time for Amazon to answer or otherwise respond to the  
23 Complaint to March 28, 2024. Dkt. No. 18.

24 On March 6, 2024, Amazon filed a motion for a temporary stay of this action pending  
25 resolution of Amazon's motion to consolidate in a case currently pending before the Honorable  
26 Tana Lin, *In re Amazon Service Fee Litigation*, Case No. 2:22-cv-00743-TL. Dkt. No. 20. That  
27 motion has been fully briefed as of March 18, 2024.

1 On March 12, 2024, Amazon filed a notice of related case in this action with respect to  
 2 *Natalie Gianne et al. v. Amazon.com, Inc.*, Case No. 2:24-cv-00309-RSM, assigned to the  
 3 Honorable Ricardo S. Martinez. Dkt. No. 23.

4 In light of Amazon's pending motion to consolidate in the *Amazon Service Fee* case, and  
 5 the parties' ongoing conferral regarding whether to consolidate this action with the related *Gianne*  
 6 case, the parties agree and respectfully request that the Court extend the following deadlines for  
 7 good cause:

Deadline for Rule 26(f) Conference	April 22, 2024
Deadline for Amazon to Respond to the Complaint	April 29, 2024
Deadline for Plaintiff to Amend, under Fed. R. Civ. P 15(a)(1)(A)	
Initial Disclosures Pursuant to Rule 26(a)(1)	April 29, 2024
Combined Joint Status Report and Discovery Plan as Required by Rule 26(f) and Local Civil Rule 26(f)	May 6, 2024

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the parties,  
 18 and respectfully submitted for the Court's approval, that the above deadlines be reset as requested.  
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Dated: March 20, 2024

Respectfully submitted,

FENWICK & WEST LLP

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15 *Attorneys for Plaintiff Wilbert Napoleon*

16 **IT IS SO ORDERED.**

17 DATED this 22nd day of March, 2024.  
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19   
Barbara Jacobs Rothstein  
U.S. District Court Judge  
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21 Presented by:  
22 FENWICK & WEST LLP

23 By: /s/ Brian D. Buckley  
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